

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

ARC CONTROLS, INC.

VERSUS

CASE NO. 1:19-cv-00391-LG-RPM

M/V NOR GOLIATH, *In Rem*, and
GOLIATH OFFSHORE HOLDINGS
PTE.LTD, *In Personam*

Consolidated with:
Case No. 1:19-cv-00395-LG-RPM

MOTION FOR SUMMARY JUDGMENT ON BEHALF OF
MCALLISTER TOWING OF NEW YORK, LLC

NOW COMES Plaintiff-in-Intervention, McAllister Towing of New York, LLC ("McAllister"), and respectfully files its Motion for Summary Judgment. Based on the undisputed facts and applicable law, McAllister is entitled to recognition and enforcement of its maritime lien rights against the M/V NOR GOLIATH. For the reasons more fully discussed in the accompanying Memorandum in Support, McAllister respectfully requests that its motion be granted.

Respectfully submitted:

s/André J. Mouledoux

GERARD J. DRAGNA (MS Bar #104083)

ANDRÉ J. MOULEDOUX (*Pro Hac Vice*)

TREVOR M. CUTAIAR (*Pro Hac Vice*)

Mouledoux, Bland, Legrand & Brackett

701 Poydras Street, Suite 600

New Orleans, LA 70139

Telephone: 504-595-3000

Facsimile: 504-522-2121

E-Mail: amouledoux@mblb.com

tcutaiar@mblb.com

gdragna@mblb.com

*Counsel for Plaintiff in Intervention, McAllister
Towing of New York, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2021, I electronically filed the foregoing with the Clerk of Court by using CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

s/André J. Mouledoux